

March 8, 2018

FREQUENTLY ASKED QUESTIONS

Dicamba Use & Mandatory Training in INDIANA

The following FAQs are in response to issues raised throughout the 2018 mandatory dicamba training season. Updates will be posted at <http://www.oisc.purdue.edu/pesticide/dicamba.html>.

1. Who needs mandatory dicamba training?

IMPORTANT: Only three dicamba products are approved for post-emergent use on dicamba-tolerant soybeans in Indiana:

- Engenia (*BASF is the registrant*)
- XtendiMax with Vapor Grip Technology (*Monsanto is the registrant*)
- FeXapan with Vapor Grip Technology (*DuPont is the registrant*)

These products are Restricted Use Pesticides and can only be purchased and used by certified applicators (*private applicators and commercial applicators*). Prior to applying or using any of these three dicamba products, the applicator must complete dicamba training. For private applicators (farmers) this includes the person who holds the private applicator license and any person who works under the private applicator's supervision when applying the product. For commercial applicators, both the licensed commercial applicator and the registered technician who works under the supervision of the commercial applicator must have the training before applying the product. This training requirement applies to applications made to soybeans and to applications on any other crops listed on these product labels.

2. Do mixers, loaders, handlers, and spray equipment cleaners need training?

Yes, anyone who is responsible for any part of the application process which includes mixing, loading, application, or cleaning dicamba application equipment must attend the training. The training is required whether you are a certified applicator or not. Workers involved in nothing more than transportation of unopened dicamba containers are not required to be trained.

3. Do I need to complete training before I purchase these products?

No, certified applicators (both private and commercial) do not need to complete training to purchase the products, but you must complete training before applying the products.

4. Who can provide training?

Only OISC-approved trainers can provide this training in Indiana. This training is being provided at all 2018 Private Applicator Recertification Programs (PARPs) and at many of the Continuing Certification Hour (CCH) trainings. All approved trainings will include a reference to MANDATORY DICAMBA TRAINING. Approved trainers include staff from CES, OISC, and select trained trainers from the application industry.

5. How long is the training?

The training will last approximately 60 minutes depending upon the number of questions and audience participation.

6. What does the training cover?

The training will cover the product application requirements, recordkeeping requirements, weed management practices, buffer requirements and protection of susceptible crops, chemistry, mixing and handling, window of application, equipment preparation, special considerations, and compliance and enforcement challenges from the 2017 spray season.

7. Do I have to take an exam?

No, the class is instruction, review and open question and answer session.

8. Will I receive a certificate after completing the training?

No, the program sponsor will maintain a roster of those attending the training and will collect provide that information to OISC. However, it is important that you keep a record of the date, location, and PARP or CCH meeting number so you can add those to your application records.

9. Do I have to be certified and licensed to attend these PARP or CCH programs?

No, anyone, certified or not, can attend dicamba training to meet this label requirement. If you are not currently a certified applicator, you will not get PARP or CCH credit, but you will get credit for attending dicamba training.

10. Do I have to attend the entire PARP or CCH program to get dicamba credit?

No, you must attend the entire dicamba portion of the program, but participation in the rest of the program applies to getting PARP or CCH credit. Our hope is that if decide to leave after dicamba training, you wait for a scheduled break so as to not disrupt other meeting participants. It is important, however, that you make sure the program sponsor has recorded your attendance which will be filed with OISC.

11. Will dicamba training from another state count as dicamba training in Indiana?

No, anyone using one of these dicamba products in Indiana must attend the mandatory dicamba training offered as part of one of the OISC-approved PARP or CCH programs. It is our understanding that dicamba training offered in the other contiguous states of Ohio, Michigan, Illinois, and Kentucky is being presented by the product manufacturers/registrants. Registrant training has not been recognized as meeting the state training requirement in Indiana.

12. Will OISC-approved dicamba training in Indiana count in other states?

OISC has been in communication with the State Department of Agriculture from the states of Ohio, Michigan, and Illinois. Each have indicated that they will accept Indiana dicamba training for applicators who apply dicamba in their respective states. We have not yet heard from Kentucky. It is important to note that label-required dicamba training is separate from and in addition to applicator certification. Therefore, reciprocal certification agreements between states do not apply to dicamba training.

13. Is training one-time or do I need training every year?

If these products continue to be registered for use after 2018, training may be an annual requirement. U.S. EPA will have to approve the continued use of these products after December 2018, and the training requirement may be revisited at that time. For now, you must complete training to use these products in 2018.

14. Will my applicator license be amended to show that I've received training?

No. You are responsible for retaining your training information for completing your application records, but OISC will have access to the dicamba training records. Pesticide dealers are not required to see the proof of training prior to selling the product to certified applicators.

15. Will OISC check my records?

OISC has the authority, under the Indiana Pesticide Use and Application Law, to request to see your record of pesticide purchases, application, and as part of any dicamba application of these products, the proof of training record. The practice of checking these records is normally associated with a misuse investigation, but OISC may also do some routine purchase or application record checks.

16. Does the *2018 Guidance for Interpreting Dicamba Labeling Terms & Phrases* document distributed at training qualify as legal guidance?

Yes, this guidance document and other guidance developed as part of this mandatory Indiana dicamba training has been created through consultation with U.S. EPA and the product registrants/manufacturers. Just like other questions about label interpretation, OISC has been trying to address questions about these dicamba labels, as they are raised. Since OISC is the state lead agency for pesticide regulation in Indiana, they will be the ultimate authority for legal compliance decisions.

17. Are downwind buffers required next to in-field grass/vegetative waterways?

No, downwind dicamba buffers would not be required next to these areas. U.S. EPA and OISC have concluded that grass waterways should be treated the same as Conservation Reserve Program (CRP) areas. Since both CRP and grass waterways include agricultural areas that could

otherwise be used for cropland production, buffers will not be required to protect these voluntary positive conservation practice areas.

18. Is a downwind buffer required if my field is bordered by a wooded lot that I own?

Yes, the requirement to protect sensitive areas like wooded or vegetative areas that may serve as habitat to an endangered species, regardless of who owns the area to be protected, is part of each of these labels. Therefore, even an adjacent wooded lot that you own or control is required to have a no-dicamba spray buffer.

19. Are adjacent or neighboring organic crops considered sensitive or susceptible?

Yes, although certified organic crops are not specifically listed as examples of sensitive or susceptible crops on these labels, the fact remains that any pesticide residues in these crops, whether damaging or not, might make these crops unfit for sale, use, or consumption as organic. Therefore, certified organics are considered sensitive or susceptible crops. The restrictions prohibiting application when wind is blowing toward the certified organic crops do apply.

20. I have a spray injection system that allows me to keep my dicamba and my other on-sprayer herbicides and adjuvants in separate tanks. The point of injection for each tank is at the spray boom. Can I use the same spray system for dicamba and other herbicides or adjuvants if those other products are not on the list of label-approved tank mixes?

No, you can't use the injection spray system to circumvent the tank mix restrictions. The labels of these products require that the entire spray system, including tanks, pumps, booms, lines, screens, and nozzles be cleaned according to label directions, both before and after application. Therefore, since it is impossible to clean the spray booms before or after injection of these dicamba products, this type of application would be prohibited. Even very small amounts of dicamba left in spraying systems have caused significant cross contamination and non-target impact issues.

21. Is there any guidance on what to do or not do with these dicamba products that have been mixed for application but then the weather changes abruptly, preventing legal application?

Purdue University has not yet done storage stability studies with the new formulations of dicamba. Therefore, we have no definitive guidance on product stability. However, currently lacking supporting data, you may be able to store a mixed load for 24-48 hrs without any problems provided you agitate it once in a while (every 4-8 hrs). Don't add a water conditioner unless an approved product is on the label. If you need to spray elsewhere, store the dicamba as a hot load (pump it into a storage tank, labeled appropriately) and clean out the sprayer before spraying a sensitive crop. If weeds get to be bigger than 4 inches, make sure all your sprayer application parameters are on label to give the herbicide the best chance to work and don't expect 100% control.

22. Will I be required to document my application parameters and conditions somehow beyond keeping a record, as required on the label?

No, legally you are only required to keep a record to document things like application start and end times, boom height temperatures, wind speeds, wind directions, nozzles, boom height, ground speed, etc. If OISC is required to investigate a complaint involving your application, they will ask for a copy of your complete application records, but will also try to verify the accuracy of certain record elements, including but not limited to, wind speeds and directions. If you choose to support your records with such things as time and date stamped photographs of weather recording instruments at boom height, those supplemental materials would certainly be considered during the investigation.

23. The application record keeping form I got at the required dicamba training did not have a space for recording “nozzle selection”. Are nozzle type and nozzle pressure required parts of the record?

Yes, both application nozzle brand/type and nozzle spray pressure used are required records to be kept for every application of Engenia, FeXapan, and Xtendimax. The updated (2-23-18) record keeping form, including the nozzle selection information space, has been posted at both <http://www.oisc.purdue.edu/pesticide/dicamba.html> and <https://ppp.purdue.edu/private-applicators/educator-resources/>.

24. I heard the rumor that if I apply these new dicamba products as a pre-plant burndown before April 16th, no downwind buffer is required. Is that true?

No, that is not true. All three of these labels require a 110 foot or 220 foot downwind buffer for every application, whether the application is pre-emergent or post-emergent, regardless of the application date.

25. Why can't I use as part of my out-of-field downwind buffer neighboring sites such as vegetative roadsides, fence rows, noncropland farmstead, pasture, hay, rangeland, turf, and sod, if these and other dicamba products are labeled for intentional use in these types of areas?

U.S. EPA is required by the federal Endangered Species Protection Act to consider potential impacts on threatened and endangered species and their habitat as part of every pesticide registration decision they make. That impact evaluation and risk assessment process is fairly lengthy and complex, and often requires the use of predictive models and assumptions when real data may not be available or applicable. In the case of the buffer requirements for these new products, some default assumptions were undoubtedly required when assessing potential exposure scenarios in non-target non-crop areas that could serve as habitat for threatened or endangered species. The environmental exposure calculations are understandably different when considering just exposure to target sites as compared to exposure to target sites plus many additional non-target sites resulting from off-target movement (drift, volatilization, runoff, etc.). So while certain label restrictions, at times, may seem contradictory with other parts of the label, there is a legal and scientific justification for some of those inconsistencies and decisions.

26. Based on the response to the previous question, if I intentionally wipe out all of the vegetation in my fence row and the roadside shoulder vegetation with a targeted legal application of glyphosate, can I then use those now barren areas as part of my out-of-field buffer?

No, the labels require a downwind buffer for all applications. The labels have a very specific list of adjacent areas that may be included in the out-of-field buffer calculation. That list includes:

1. Roads, paved, and gravel surfaces.
2. Agricultural fields that have been prepared for planting.
3. Planted agricultural fields containing asparagus, corn, DT cotton, DT soybeans, sorghum, proso millet, small grains, and sugarcane.
4. Areas covered by the footprint of a building, shade house, silo, feed crib, or other manmade structure walls and or roof.

Barren soil created by total vegetation control herbicides is not on the approved label list of acceptable buffer areas.

27 If non-DT soybeans are especially sensitive to off-target exposure to dicamba, why am I not able to map my non-DT soybeans on the sensitive crop registry DriftWatch?

As you may be aware, DriftWatch <https://in.driftwatch.org/map> is a voluntary mapping and communication tool to help pesticide applicators learn about pesticide sensitive specialty crops that may be located near agronomic row crop fields and sites. This registry is maintained by the not-for-profit organization FieldWatch. We asked the good folks at FieldWatch about mapping non-specialty crops such as non-DT soybeans that are now a concern due to the introduction of genetically engineered crops such as Xtendimax soybeans. We were advised, *“Thanks for your inquiry regarding non dicamba beans. We have received several inquiries about adding beans to the DriftWatch Specialty Crop Registry. It has been an agenda item at our board meetings as we discussed the scope of our registry. At this time, we are focused on providing a registry for specialty crops and apiaries. If your crops are certified organic or in transition to certified organic, then they may be mapped. In addition, we are considering a pilot program for beans, but it will not be available for the 2018 season.”*

28. I have a spray injection system that allows me to keep my dicamba and my other on-sprayer herbicides and adjuvants in separate tanks. The point of injection for each tank is at the spray boom. If the other tank mix partners (both herbicides and adjuvants) are approved for tank mixing on the dicamba label, can I turn off the dicamba flow to my spray boom and be legal while spraying the non-dicamba components of my tank mix to the required downwind buffer area?

Yes, if the tank mix partners on your spray rig are approved for use with the new dicamba products and if you can successfully turn off the flow of dicamba before you get to the buffer area, you can spray the buffer without first cleaning out your spraying system according to label requirements. However, it is recommended that you turn off the flow of dicamba before you

actually get to the downwind buffer area to allow the dicamba left in the spray boom to purge itself from your spray rig.

29. I understand that Indiana is not distributing certificates to trainees at the state-required mandatory dicamba training sessions. If I am in need of documentation that I attended one of the approved training programs, where might I get that?

If you are a licensed applicator, go to the OISC website <http://www.oisc.purdue.edu/> , click on MY RECORDS, search on your name and license # (or last 4 digits of your SSN), click on the CONFERENCE NAME where you attended the dicamba training, and save/print a copy of that record.

30. I have not yet attended an Indiana mandatory dicamba training program. How much longer will these state-required programs be offered?

In addition to the CCH and PARP dicamba training programs already approved through the end of end of July, 2018, a PARP with dicamba training webinar has also been scheduled for **March 23, 2018** at 1:00 PM EST. This approved PARP plus dicamba training webinar will be broadcast in over a dozen of the County Cooperative Extension Service facilities statewide. Check the PARP Events website at <https://ppp.purdue.edu/> or with your county CES office for availability. In addition, the dicamba training portion of the webinar will be recorded and saved for individual or small group viewing at County CES facilities by appointment later in the year. Again check with your local CES office for availability.